

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

THOMPSON PRODUCTS, INC.,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 05-11810-RGS
)	
GLENN THOMPSON, <i>et al.</i> ,)	
)	
Defendants.)	
_____)	

MOTION TO DISQUALIFY

Plaintiff, Thompson Products, Inc. ("TPI"), by counsel, pursuant to Rule 1:9 of the Massachusetts Rules of Professional Conduct, adopted by the District of Massachusetts in Local Rule 83.6 (4) (B), and Local Rule 7.1, moves the Court for entry of an order disqualifying Matthew F. Medeiros and his firm, Little Medeiros Kinder Bulman & Whitney, P.C., from continuing to represent defendants, Glenn Thompson and Thompson Enterprises, Inc., on the ground that Mr. Medeiros and his firm represented TPI in prior litigation that is substantially related to this action, as more fully developed in TPI's Memorandum in Support of Motion to Disqualify, filed simultaneously herewith.

THOMPSON PRODUCTS, INC.

By its attorneys,

/s/ Andrew D. Kang

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DATED: November 14, 2005

CERTIFICATE OF SERVICE

I, Andrew D. Kang, hereby certify that on the 14th day of November, 2005, I served a copy of the foregoing by U.S. Mail to the following counsel of record:

Matthew F. Medeiros, Esq.

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/s/ Andrew D. Kang

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